

REMARKS

The Office Action dated December 7, 2007, has been received and carefully noted.

The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 8-11, and 14-26 have been amended to more particularly point out and distinctly claim the subject matter which is the invention. No new matter has been added. Support for the above amendments can be found at least in Fig. 3, Fig. 4, Fig. 6, and Fig. 7. Claims 1-26 are submitted for reconsideration.

Claims 1-26 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 7,123,910 to Lucidarme. The rejection is traversed as being based on a reference that neither teaches nor suggests the elements of claims 1-26.

Independent claim 1, upon which claims 2-10 are dependent, recites a method that includes creating a first interface instance between an interworking unit and at least one of the networks selected from a group of networks comprising a core network and a neighbouring radio access network. The method implements a signaling bearer connection in a distributed radio access network. The method also includes creating a second interface instance between said interworking unit and a set of internet protocol base stations. The method further includes assigning temporary identifier information to user equipment that has a connection to an internet protocol base station of said set of internet protocol base stations. The method additionally mapping of the signalling traffic between said first and said second interface instances in said interworking unit, said

mapping assigning signalling traffic from said first interface instance to said second interface instance based on said temporary identifier information.

Independent claim 11, upon which claims 12-18 are dependent, recites a system that includes a set of internet protocol base stations. The system also includes at least one of a core network and a neighbouring radio access network. The system further includes an interworking unit configured to connect said core network to said set of internet protocol base stations and to at least one of said networks, said interworking unit comprising a first interface instance between said interworking unit and at least one of said networks, a second interface instance between said interworking unit and said set of internet protocol base stations, and a mapper configured to map the signalling traffic between said first and said second interface instances, said mapper assigning signalling traffic from said first interface instance to said second interface instance based on temporary identifier information associated with a user equipment.

Independent claim 19, upon which claims 20-26 are dependent, recites an apparatus that includes a first interface instance between said apparatus and at least one of said networks. The apparatus is connected to at least one of a core network and a neighboring radio access network and to a set of internet protocol base stations in a distributed radio access network. The apparatus also includes a second interface instance between said apparatus and a set of internet protocol base stations which has been equipped with radio access control equipment. The apparatus further includes a mapper configured to map the signalling traffic between said first and said second interface

instances, said mapping assigning signalling traffic from said first interface instance to said second interface instance based on temporary identifier information associated with a user equipment. The apparatus is configured to function as a logical radio network controller.

As will be discussed below, Applicants respectfully submit that the cited reference does not disclose or suggest all of the elements of the pending claims.

Lucidarme generally describes communication systems and methods for allowing a single mode mobile terminal to support mobile assisted signal strength measurement operations in both a fixed frequency reuse based communication network and an adaptive channel allocation based communication network. Candidate base station signal strength measurements are requested by a fixed frequency reuse type network, measured by the mobile terminal and provided to the fixed frequency reuse type network which is seeking to identify a strongest signal for mobile assisted handover operations.

In addition, interference signal strength measurements are requested by an adaptive channel allocation type network, measured by the mobile terminal and provided to the adaptive channel allocation type network by the mobile terminal. No redundant circuitry is required in the mobile terminal. Instead, the mobile terminal executes the same operations using the same hardware regardless of whether the requested measurement is of a candidate signal strength or an interference signal.

Applicant submits that Lucidarme does not disclose or suggest each of the elements of the pending claims. Each of independent claims 1, 11 and 19, in part, recites a second interface instance between the interworking unit and a set of internet protocol base stations. Each of independent claims 1, 11 and 19, in part, also recites that an interworking unit maps the signalling traffic between the first and the second interface instances, the mapping assigning signalling traffic from the first interface instance to the second interface instance based on the temporary identifier information. Lucidarme does not disclose or suggest these features.

Lucidarme generally describes communication systems and methods that allow a single mode mobile terminal to support mobile assisted signal strength measurement operations in both a fixed frequency reuse based communication and an adaptive channel allocation based communication network. Lucidarme basically discloses performing Radio Access Bearer (RAB) relocation to another network. In order to do that, a SGSN in Lucidarme receives a request for a new RAB for connecting to another network. The SGSN prepares the new routing path to the selected network. See, at least column 10, lines 39-65 of Lucidarme.

Applicants respectfully submit that Lucidarme fails to disclose or suggest that the second interface instance is towards a set of internet protocol base stations. As noted above, the pending claims recite that a temporary identifier assigned to user equipment is used to map signaling traffic between the first and second interface instances in the interworking unit. In other words, the temporary identifier also

identifies within the interworking unit a correct internet protocol base station towards which the signaling traffic is intended. The temporary identifier disclosed in Lucidarme does not identify an internet protocol base station at the same time.

Furthermore, Lucidarme does not disclose or suggest that the interworking unit hides a large amount of internet protocol base station from the core network and the neighbouring radio access network.

Based on the distinctions noted above, Lucidarme fails to disclose or suggest, in part, “creating a second interface instance between said interworking unit and a set of internet protocol base stations,” as recited in the presently pending claims. (Emphasis Added).

Applicant respectfully asserts that the rejection under 35 U.S.C. 102(e) should be withdrawn because Lucidarme fails to disclose or suggest each feature of claims 1, 11, and 19 and hence, dependent claims 2-10, 12-18 and 20-26 that depend thereon.

In the “response to arguments” section, the Office Action asserted that the base stations are not limited to internet protocol base stations in the claims. As discussed above, the claims have been appropriately amended to recite the base stations limited to internet protocol base stations. Therefore, it is respectfully requested that the rejection be withdrawn.

As noted previously, claims 1-26 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. Also, it is respectfully submitted that the subject matter is more than sufficient to render the claimed invention

unobvious to a person of ordinary skill in the art. It is therefore respectfully requested that all of claims 1-26 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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